## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE DIGITEK®
PRODUCTS LIABILITY LITIGATION

**MDL NO. 1968** 

THIS DOCUMENT RELATES TO ALL CASES

## NOTICE OF VIDEO DEPOSITION

Please take notice that the Plaintiffs Steering Committee will take the reconvened video deposition of Paul Galea before a court reporter or other official authorized by law to take depositions, on Friday, March 19, 2010, at 9:00 a.m. to be conducted at the offices of Harris Beach PLLC, 100 Wall St., New York, New York, 10005 at which time and place you are notified to appear and take such part of said deposition as may be proper. This deposition is being reconvened pursuant to PTO 52 in this action.

This deposition will be recorded stenographically and on videotape, and will comply with any relevant orders in this MDL. This deposition is noticed in the above-captioned matter for any and all purposes permitted by the Federal Rules of Civil Procedure, and any other federal, state, or local rules that apply to this action and the deposition will be taken in accordance with these rules. The oral examination will continue from day to day until completed.

Dated: February 25, 2010

Respectfully submitted,

On Behalf of the Plaintiffs' Steering Committee

s/Fred Thompson, III Esq.
Fred Thompson, III, Esq.
Motley Rice, LLC
28 Bridgeside Blvd.
Mt. Pleasant, SC 29464
Co- Lead Counsel

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Co-Lead and Liaison Counsel

## **CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2010, the above notice was emailed to counsel for Actavis Totowa, Inc.. I also certify that on February 25, 2010, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/Fred Thompson, III Esq.
Fred Thompson, III, Esq.
Motley Rice, LLC
28 Bridgeside Blvd.
Mt. Pleasant, SC 29464
Co- Lead Counsel